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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IRIS M. VALENCIA,)	Civil No. 3:16-cv-03004-EDL
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR A FIRST EXTENSION OF TIME
v.)	FOR DEFENDANT TO FILE HER
)	MOTION FOR SUMMARY JUDGMENT
CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	AS MODIFIED
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and with the approval of the Court, that Defendant shall have a first extension of time of 30 days to file her motion for summary judgment. Defendant respectfully requests this additional time because of the heavy accumulated workload following two weeks of leave over the holidays, and because the undersigned has an upcoming oral argument in the Ninth Circuit in early February.

1 The new due date for Defendant's motion for summary judgment will be Monday,
2 February 13, 2017. Plaintiff shall have until February 27, 2017 to respond to Defendant's Motion.

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5 Respectfully submitted,

6 Date: January 25, 2017

LAW OFFICES OF LAWRENCE D. ROHLFING

7 By: /s/ Jeffrey Chen for Cyrus Safa*

8 CYRUS SAFA

* By email authorization on Jan. 25, 2017

9 Attorney for Plaintiff

10 Date: January 25, 2017

MELINDA HAAG

11 United States Attorney

12 By: /s/ Jeffrey Chen

13 JEFFREY CHEN

14 Special Assistant United States Attorney

15 Attorneys for Defendant

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19 ORDER

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21 APPROVED AND SO ORDERED:

22 DATED: January 25, 2017

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24 HON. ELIZABETH D. LAPORTE
25 UNITED STATES MAGISTRATE JUDGE
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